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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

1) \$1,774.65 IN WELLS FARGO ACCOUNT  
XXXXXX4687;

2) \$4,906.28 IN BANK OF AMERICA  
ACCOUNT XXXXXX1479;

3) \$18,944.75 IN E\*TRADE FINANCIAL  
ACCOUNT XXX-22920;

4) 1998 SUZUKI SIDEKICK, VIN  
JS3TD21V8W4100132, CALIFORNIA  
LICENSE 4YYF388; AND

5) MISCELLANEOUS FIREARMS AND  
AMMUNITION,

Defendants.

**No. C 08-0496 JF**

**CASE MANAGEMENT CONFERENCE  
STATEMENT**

Date: May 16, 2008

Time: 10:30 a.m.

Place: Hon. Jeremy Fogel

**1. Jurisdiction**

This Court has jurisdiction pursuant to Title 28, United States Code, Sections 1345 and 1355 and Title 18, United States Code, Section 981.

**2. Description of Case**

This is a forfeiture action. The defendant property is subject to forfeiture, pursuant to Title 18,

1 United States Code, Section 981(a)(1)(G)(iv), as property belonging to Rahmat Abdhir, an individual  
2 engaged in the planning or perpetuating acts of international terrorism as defined by section 2331 against  
3 a foreign government. There government further contends that the defendant property was used or  
4 intended to be used in preparation and carrying out of violations of Title 18, United States Code, Sections  
5 956(a)(1) and 2339A. The defendant property was seized by agents of the Federal Bureau of  
6 Investigation (FBI) on or about August 2, 2007, and is currently in the custody of the United States  
7 Marshals Service in the Northern District of California, with the exception of the defendant firearms and  
8 ammunition which is currently in the custody of the Federal Bureau of Investigation in San Jose.

### 9 **3. Service/Parties to the Action**

10 On January 29, 2008, the government served a copy of the complaint and other related  
11 documents on Rahmat Abdhir, through his criminal attorney Assistant Federal Public Defender Nicholas  
12 Humy, as provided for by Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset  
13 Forfeiture. Government counsel also served notice to Aysa Dong, Rahmat Abdhir's wife, through  
14 Federal Public Defender Barry Portman, whose office provided the letter upon which Ms. Dong's  
15 administrative claim was submitted. To date, no claims have been filed in this judicial action. Out of an  
16 abundance of caution, government counsel will re-serve Ms. Dong at her residential address to insure  
17 that she receives proper notice.

### 18 **4. Anticipated Motions**

19 The government intends to file a motion for default if after the re-service of notice on Aysa Dong  
20 there are still no claims contesting the forfeiture of the defendant property.

### 21 **5. Related Case**

22 This civil forfeiture case is related to the criminal action captioned, *United States v. Rahmat Abdhir*,  
23 *et al*, CR 07-00501 JF, currently pending in this district.

24 DATED: 05/13/08

25 \_\_\_\_\_ /S/  
26 STEPHANIE M. HINDS  
27 Assistant United States Attorney  
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned further certifies that she caused a copy of

CASE MANAGEMENT CONFERENCE STATEMENT

to be served this date via first class mail delivery upon the person(s) below at the place(s) and address(es) which is the last known address(es):

Nicholas P. Humy  
Federal Public Defender's Office  
160 W. Santa Clara, Suite 575  
San Jose, CA 95113  
Attorney for Rahmat Abdhir

Barry Portman  
Federal Public Defender's Office  
160 W. Santa Clara, Suite 575  
San Jose, CA 95113  
Attorney for Aysa Dong

Aysa Dong  
2965 Sunwood Drive  
San Jose, CA 95111

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 13<sup>th</sup> day of May, 2008, at San Francisco, California.

\_\_\_\_\_  
/S/  
CAROLYN JUSAY  
Legal Assistant  
Asset Forfeiture Unit